

SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Bruce E. Clark

Attorneys for Giants Stadium LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	
	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	Jointly Administered
	:	

**NOTICE OF INTENT OF GIANTS STADIUM LLC TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Giants Stadium LLC (“Giants Stadium”), represented by Sullivan & Cromwell LLP, filed Claims Numbers 64070 and 64071, amending Claims Numbers 33561 and 33562, against Lehman Brothers Special Financing Inc. and Lehman Brothers Holdings Inc., respectively, both in the amount of \$301,804,617.14 and is a party of interest in the confirmation of a plan in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) on the basis that its interest in these claims may be affected by the provisions of the plan(s).

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and any limitations imposed by the Court, Giants Stadium and its counsel intend to participate in Plan Discovery, as defined in the Order Establishing Schedule and Procedures in

Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 [Docket No. 16003] (the "Order").

This Notice of Intent is filed as a precautionary measure. Giants Stadium filed a motion for leave to conduct Rule 2004 discovery relating to its claims [Docket No. 16016, filed April 14, 2011]. Debtors' and Creditors' Committee's Counsel have requested, and Giants Stadium has agreed to, an extension until May 9, 2011 for them to respond to that motion. Although the Order specifies that it shall not apply to discovery sought by an individual creditor in connection with such creditor's claim(s), to the extent the Debtors or the Creditors' Committee argues that Giants Stadium's proposed discovery should not be permitted because it should be treated as plan discovery, Giants Stadium reserves its rights.

Dated: New York, New York
April 28, 2011

Respectfully submitted,

SULLIVAN & CROMWELL LLP

By: /s/
Bruce E. Clark
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Attorneys for Giants Stadium LLC

Contact Information for Party in Interest

Giants Stadium LLC
Timex Performance Center
1925 Giants Drive
East Rutherford, New Jersey 07073
Attention: Bill Heller, General Counsel
Telephone: (201) 935-2501
Email: Bill.Heller@Giants.NFL.net

Contact Information for Attorneys for Party in Interest

Sullivan & Cromwell LLP
125 Broad Street
New York, New York 10004
Attention: Bruce E. Clark
Telephone: (212) 558-4000
Email: clarkb@sullcrom.com

Designation of Contacts to Receive Any Notices Required Under the Order

Sullivan & Cromwell LLP
125 Broad Street
New York, New York 10004
Attention: Bruce E. Clark
Matthew A. Schwartz
Thomas John Wright
Telephone: (212) 558-4000
Email: clarkb@sullcrom.com
schwartzmatthew@sullcrom.com
wrightth@sullcrom.com

Group that Participant Elects to Join Pursuant to Paragraph 3(b) of the Order

¶ 3(b)(v) Creditors of the Derivative Entity Debtors¹

¹ Giants Stadium holds Claims represented by more than one group listed in ¶ 3(b) of the Order and reserves its right to make discovery requests relating to any issues of fact and law involving any plans of reorganization filed in the Chapter 11 Cases.